

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

UNITED STATES OF AMERICA

V.

ROBERT REYNOLDS

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CASE NO: 1:06-CR-124-WHA

UNOPPOSED MOTION TO CONTINUE SENTENCING

COMES NOW the Defendant, Robert Reynolds (“Mr. Reynolds”), by undersigned counsel, Christine A. Freeman, and respectfully moves that the sentencing hearing, now set in this matter for April 10, 2007, be continued to a later date.

In support of this motion, the Defendant would show the following:

1. Counsel for the defendant has submitted objections to the presentence report, which may require further opportunity for review and discussion with the probation officer and government counsel.
2. Defendant’s counsel will be out of the state from March 18 through March 22, attending a meeting in Washington, D.C. on March 19 and 20, and thus unable to confer regarding those objections until the following week.
3. This scheduling is necessary for effective preparation for the sentencing hearing.
4. Counsel for the prosecution has authorized undersigned counsel to state that the prosecution does not oppose this motion.

WHEREFORE, defendant respectfully requests that this Motion be granted.

Respectfully submitted,

s/Christine A. Freeman
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TN BAR NO.: 11892

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CERTIFICATE OF SERVICE

I hereby certify that on March 19, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Susan Redmond, Esq., Assistant United States Attorneys, One Court Square, Montgomery, AL 36104.

s/Christine A. Freeman
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